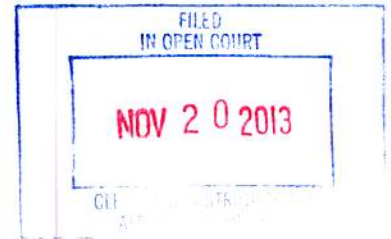


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)

v.)

CURTIS MARTINO,
a.k.a. "Curtis Dodd"
a.k.a. "Red Rum"

Defendant.)

Case No. 1:13-cr-350 – (02)

The Honorable Leonie M. Brinkema

STATEMENT OF FACTS

The United States and the defendant, Curtis Martino, also known as Curtis Dodd and Red Rum, agree that had this matter proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt:

1. The "Nine Trey Gangsters" (NTG) is a criminal street gang operating within the Eastern District of Virginia and a set of the United Blood Nation. Members and associates of NTG were engaged in a racketeering conspiracy involving the unlawful distribution of cocaine base and other illegal narcotics, as well as robbery, and other crimes of violence. Members and associates of NTG were also engaged in the sex trafficking of adults by coercion or force, in Virginia and other states on the East Coast, from at least in and around 2011 to in and around August 2013.

2. A "line-up" is Bloods terminology for a specified group of gang members operating in a particular geographic area. Three NTG line-ups operated within the Commonwealth of Virginia. A "High-Stain" is the leader of an NTG line-up. One Virginia line-up was led by Thaddaeus Snow, also known as Storm, with members in Northern Virginia and


Hampton Roads. A line-up in the Richmond area was led by Quincy Burrell, also known as 1090, who was recently convicted in a separate federal conspiracy case. The defendant had the rank of "High-Stain" in a line-up that had over twenty members located in Virginia, Maryland, and the District of Columbia. The defendant and the other High Stains answered to the gang's "Godfathers" in New York. Martino regularly interacted directly with the Godfathers, including visiting a Godfather in a New York state correctional facility.

3. NTG members in Curtis Martino's line-up had to pay \$31 in dues monthly to the gang. As the High Stain, Martino ensured these dues were paid and forwarded a portion of them to the Godfathers or their representatives in New York. From March 17, 2011 to February 23, 2013, records of wire transfers obtained by subpoena show that Martino wired dues money to T.G. and a family member of T.G. on numerous occasions. An NTG member subordinate to Martino wired dues to T.G. on an additional three occasions at Martino's direction. Martino also hand-delivered dues money to the leadership in New York. On September 15, 2012, in a recorded phone conversation, Martino told Thaddaeus Snow that Martino could pick-up his dues and deliver them to New York even if Snow did not want to accompany Martino on the trip. Curtis Martino was aware that NTG members paid their dues to him from the proceeds of drug sales, prostitution, and robberies.

4. Most of the NTG members in Curtis Martino's line-up distributed illegal narcotics including crack cocaine, powder cocaine, ecstasy, marijuana, and prescription opiates. It was reasonably foreseeable to the defendant that more than 280 grams of crack cocaine base was distributed by members of the gang. As the line-up's High-Stain, Martino's role did not necessarily involve hands-on contact with narcotics or firearms. He was instead kept informed of the activities of those beneath him in the line-up and his rank permitted him to approve or

disapprove those criminal acts. Martino's leadership position also meant he handed-out disciplinary sanctions, such as a beating for 31 seconds, when an NTG member violated the gang's rules. For instance, Christopher Head informed Martino that Lionel Ritchie was smoking PCP against the gang's rules and Martino directed that Ritchie receive a disciplinary beating.

5. Martino also dealt in counterfeit United States currency.

6. On June 9, 2013, Curtis Martino and three other members of his NTG line-up drove from Alexandria, Virginia to  in Forest Heights, Maryland which was the home of K.W., a Crip gang member who cultivated marijuana for sale. The four gang members brought firearms and went to the Maryland residence with the intent of assaulting K.W. Upon arrival at the residence, Martino and his NTG members used a female acquaintance of K.W. to gain access to the residence. K.W. was confronted by members of Martino's group. A struggle ensued and an NTG member shot K.W. twice in the upper torso with a .38 caliber revolver.

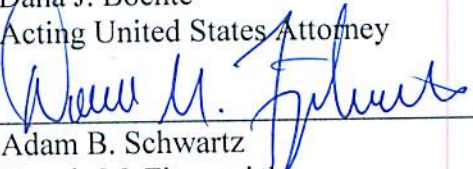
7. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the government. It does not include each and every fact known to the defendant or the government, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

8. The actions of the defendant as recounted above were in all respects knowing and deliberate, and were not committed by accident, mistake, or other innocent reason.

Respectfully submitted,


Dana J. Boente
Acting United States Attorney

By:


Adam B. Schwartz
Dennis M. Fitzpatrick
Assistant United States Attorneys

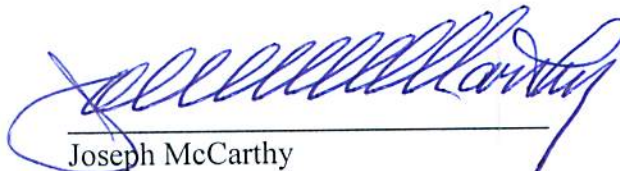
Defendant's Stipulation and Signature: After consulting with my attorney and pursuant to the plea agreement I entered into this day with the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proven the same beyond a reasonable doubt.

Date: 11-20-13


Curtis Martino
Defendant

Defense Counsel's Signature: I have carefully reviewed the above statement of facts with my client, Curtis Martino. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 11-20-13


Joseph McCarthy
Counsel for the Defendant